Kachemak Bay Conservation Society



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Alaska Department of Transportation and Public Facilities Statewide Planning Office Division of Program Development 3132 Channel Drive, Suite 200 Juneau, AK 99801-7898

December 31, 2005

Re: Williamsport/Pile Bay Road project

Dear DOT&PF:

The Kachemak Bay Conservation Society's mission is to protect the environment of the Kachemak Bay region and encourage sustainable use and stewardship of local natural resources through advocacy, education/information, and collaboration. KBCS has concerns about the potential Williamsport/Pile Bay Road project, the subsequent mining projects it would facilitate, and the impacts on the Kachemak Bay region.

Environmental and fisheries impacts are a risk

Although the Williamsport-Pile Bay Road traverses anadromous streams, to our knowledge, there are no publicly released reports that describe what impacts that upgrade of the road will have on fish or wildlife. If the road will be used for hauling petroleum products, what are the risks of an oil spill from an overturned truck? Which route provides the least risk? If another Hickel Highway type fiasco is to be avoided, the public need to be assured that project review is not being compromised by other agendas.

The Williamsport-Pile Bay Road under STIP fragments project scope, which may violate NEPA. The Williamsport-Pile Bay Road is really just a piece of a much larger project which is intended to provide the Pebble Mine site with not only an industrial scaled road, port, and air access, but a significant amount of electric power connection. When impacts from a project are evaluated piece by piece, it often turns out that the sum of the pieces doesn't add up to the whole. Consequently, Environmental Impact Studies for project that have been fragmented often fail to pass the "adequate and complete" test. We think this may be a real possibility with the Williamsport-Pile Bay Road STIP project.

In summary, we have found serious procedural flaws with listing the Williamsport-Pile Bay Road project as a STIP project. Furthermore, the desire to have the State build part of the transportation infrastructure needed by the private sector is being commingled with policy objectives that are intended to serve a public purpose, obscuring the decision-making process.

We ask the DOT&PF to reconsider its apparent commitment to funding and building this project at this time. We think the money could be better spent on other road projects that actually have an existing need and more clearly serve the public.

Dylan Weiser President